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Attorneys for Federal Defendant

UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF CALIFORNIA  
SAN FRANCISCO DIVISION

KATHERINE WILLIAMS,	)	No. C 08-00026 WHA
	)	
Plaintiff,	)	
	)	DECLARATION OF
v.	)	ABRAHAM A. SIMMONS
	)	IN SUPPORT OF DEFENDANT'S
JOHN E. POTTER, POSTMASTER	)	RESPONSE TO PLAINTIFF'S
GENERAL,	)	DISCOVERY DISPUTE
	)	
Defendant.	)	

I, Abraham A. Simmons, declare as follows:

- I am an Assistant United States Attorney in the Northern District of California and I have been assigned to represent the government in the above-captioned matter. If called to testify I would and could competently testify as to the facts in this declaration.
- Attached as Exhibit 1 electronically to this declaration is a true and correct copy of Plaintiff's April 10, 2008, discovery requests.
- Attached as Exhibit 2 electronically to this declaration is a true and correct copy of Plaintiff's letter dated April 30, 2008.
- Attached as Exhibit 3 electronically to this declaration is a true and correct copy of Plaintiff's May 1, 2008.
- Attached as Exhibit 4 electronically to this declaration is a true and correct copy of Defendant's written responses to plaintiff's first set of document requests.

6. Attached as Exhibit 5 electronically to this declaration is a true and correct copy of Plaintiff's May 12, 2008, letter.

7. Attached as Exhibit 6 electronically to this declaration is a true and correct copy of Defendant's May 20, 2008, email to Plaintiff requesting to know her preference regarding how to send her documents responsive to her discovery requests.

8. Attached as Exhibit 7 electronically to this declaration is a true and correct copy of Plaintiff's May 26, 2008 letter to the court requesting an order to compel production of documents and other relief.

9. Attached as Exhibit 8 electronically to this declaration is a true and correct copy of the cover letter enclosing documents delivered to plaintiff by messenger on May 27, 2008.

10. Attached as Exhibit 9 electronically to this declaration is a true and correct copy of Plaintiff's May 28, 2008, letter requesting that the court disregard her May 26, 2008 letter.

11. Attached as Exhibit 10 electronically to this declaration is a true and correct copy of Plaintiff's May 29, 2008 letter requesting additional discovery.

I declare under penalty of perjury under the laws of the United States that the above is true and accurate. Executed this 6<sup>th</sup> day in June, 2008, in San Francisco, California.

/s/  
ABRAHAM A. SIMMONS (SBN 146400)